

# EXHIBIT 20



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## Re: WSOU Investments LLC v. Google LLC - Rule 30(b)(6) Objections

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**Travis Richins** <travis@etheridgelaw.com>

Thu, Nov 18, 2021 at 11:11 AM

To: Ellie Silberhorn <ellie@warrenlex.com>

Cc: Greg Lanier <tglanier@jonesday.com>, Mike Jones <mikejones@potterminton.com>, "WSOU Investments LLC v. Google LLC" <20-571@cases.warrenlex.com>, "WSOU Investments LLC v. Google LLC" <20-580@cases.warrenlex.com>, "WSOU Investments LLC v. Google LLC" <20-583@cases.warrenlex.com>, "WSOU Investments LLC v. Google LLC" <20-585@cases.warrenlex.com>, WSOU-Google <WSOU-Google@jonesday.com>, IPTeam <IPTeam@etheridgelaw.com>, "mark@swclaw.com" <mark@swclaw.com>

Jen,

WSOU raised issues regarding Google's Rule 30(b)(6) objections in a letter dated September 27, 2021. Later, Google raised issues regarding WSOU's Rule 30(b)(6) objections in a letter dated October 6, 2021.

In response to your October 6 letter, WSOU did not designate individuals on certain topics based on its valid objections. WSOU has also properly limited the scope of certain topics. For example, we have repeatedly informed you of the Court's position on negotiations. You have repeatedly ignored this, apparently intent on burdening the court and driving up costs.

We are willing to confer regarding Google's and WSOU's 30(b)(6) objections. Given the Thanksgiving holiday, please propose a few windows of time, including the week after Thanksgiving.

Sincerely,

**Travis Richins** | Etheridge Law Group

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